

**ATTACHMENT 4**

**PERSONNEL TRAINING**

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## **1.0 Introduction**

Employees assigned to work at the Northeast Casualty Real Property facility are Clean Harbors Aragonite employees. Clean Harbors Aragonite, has in-house training programs for all employees with additional training for employees assigned to the Clive facility. All personnel receive a general orientation training including first aid and CPR. When personnel are assigned to their respective groups, they receive specific job related training. Until an employee is a qualified, he/she must work under supervision. All employees must successfully complete the courses in Table 2 prior to working unsupervised in the job title indicated.

Each department manager is responsible for the training and qualification of the individuals reporting to him/her. Overall coordination of the training program is the responsibility of the Aragonite General Manager.

## **2.0 Outline of Training Program**

### **2.0.1 Personnel Regularly assigned to Clive**

Personnel assigned to Northeast Casualty Real Property Clive will receive training as noted on Table 2. Also, non-Clive personnel assigned to a Clive/Aragonite manager to work under his/her direct supervision at Clive (e.g., temporary employees), will have the same training requirements as for Aragonite personnel assigned to Clive. They will have job titles from the list in Table 2 and will be required to complete the training specified in Table 2. Employees assigned to Clive will be identified as such in the training records.

The required training occurs within six months of date of hire or within six months of assignment to Clive or within six months of a new position at Clive, whichever is later.

### **2.0.2 Personnel not regularly assigned to Clive**

Additionally, other personnel at the Clive site will be required to receive a level of training consistent with their purpose at the site. These persons include Clean Harbors Aragonite employees, contractors, Clean Harbors employees from corporate offices or from other facilities, visitors, and any others for whom training would be necessary. The following outlines the training required for these persons.

If the person will be working in areas where hazardous waste handling occurs, then the minimum required training will include courses 1301.1 [and 1301.1(R) or 1303.1-12 if applicable] and the Pre-project Environmental, Health, and Safety Review. If the person will be using a facility forklift, then forklift training, course 1501.1, or a comparable course [and 1501.1(R) if applicable], is required.

Visitors who may be in areas where hazardous waste handling occurs are not required to have the training outlined above provided they are constantly escorted by an appropriately trained

employee. Other persons working in areas where hazardous waste handling does not occur will have training consistent with their task. The minimum training required for each person will be determined on a case-by-case basis. At a minimum, all contractors, visitors, and other non-Clean Harbors personnel will be required to receive an initial safety orientation prior to entering the site.

## **2.1 Training Review**

Some courses require an annual or triennial refresher, such as CPR and First Aid. Annual refresher courses must be taken in the same quarter of the following year of the initial training. That is, if the initial training was January 15, then the refresher training must be taken no later than the end of the first quarter. Refresher training in all topics on Table 1 occurs as noted.

## **2.2 Training Personnel Records**

Records of employees assigned to Clive will be kept at the Aragonite facility for examination by the State of Utah. The following will be included in these individual employee training records as applicable:

- Attendance record at training sessions
- Qualification cards and examinations
- Training received (Summary with title of course and date.)
- Previous training and/or education, i.e., certifications, certificates
- Employment dates including dates employee was assigned to Clive

The minimum training record documentation is described in section 2.5.

## **2.3 Training Coordinator**

The training coordinator for the Northeast Casualty Real Property Clive facility is the Regulatory Training Specialist for the Aragonite facility, who reports to the Health and Safety Manager.

## **2.4 Training for Emergency Response**

The contingency plan is the basis for emergency response training. Emergency response training is coordinated by the Training Department at Aragonite.

## **2.5 Training Documentation**

Training will primarily be documented on an attendance roster. Other forms of documentation may be used (e.g., certificates of completion, computer printouts, etc.) when attendance rosters are not used (such as for self study programs). Each employee has a training file maintained by the Training Department at the Aragonite facility which contains all of the required documentation. Training records on current personnel must be kept until closure of the operating portion of the facility; training records on former employees must be kept for at least three years from the date the employee last worked at the facility.

To ensure that the training program is effective and people are properly trained, exams or other measures of competency are used. If a person fails the exams or otherwise does not meet the minimum requirements of the training course, additional training will be required before the person is considered to have completed the course.

The following outlines the requirements for documenting compliance with the training requirements for non-Clean Harbors personnel.

Since the Pre-project Environmental, Health, and Safety Review is specific to the Clive facility, this training will be conducted by the Aragonite or Clive facility personnel and records will be maintained on-site or at the Aragonite facility documenting successful completion of the review for each person. However, other training may be completed at other locations.

For transient goods and services contractors who have received applicable training at other locations, the employer will provide a letter certifying that this training has been completed by each of the employees that will be working at the facility. This letter will be kept on site or at the Aragonite facility. Additionally, if requested by the Executive Secretary, Northeast Casualty Real Property Clive will acquire the records of training for specific individuals to demonstrate that the required training has indeed been completed.

Training records for Clean Harbors personnel who are not assigned to the facility will be provided upon request. When working in areas where waste handling occurs, they will be assigned a job title from Table 2 and the training specified in that table will be required.

For other persons working in areas where hazardous waste handling does not occur, if training in the courses listed in Table 1 is required, this will be documented and the records of successful completion of the required training will be provided upon request.

### **3.0 Job Titles and Duties**

This section outlines the plant organization and required training.

The job titles for Aragonite employees assigned to Clive are listed in Table 2. Also listed in Table 2 are job titles for Clean Harbors Aragonite employees who have been identified to have occasional or administrative responsibilities for Clive Activities.

These job titles correlate to job descriptions which can be found in the Job Description Notebook available from Human Resources at Aragonite. Table 2 lists the required training at the facility. A current organization chart showing the employees assigned to the Clive facility is available at Aragonite from Human Resources. The chart specifies by name which person fills what job title.

All employees assigned to Clive receive general employee training designed to focus on the overall purpose of the Northeast Casualty Real Property Clive facility.

Annually, the Aragonite Managers will review the training program with the General Manager. The annual review will consist of evaluating faculty and courses to determine their relevancy and quality. Adjustments will be made as warranted.

<b>Table 1 - List of Courses</b>				
	<b>Course Title</b>	<b>Course ID</b>	<b>Duration</b>	<b>Frequency</b>
	OSHA 29 CFR 1910.120	1301.1	24 hr	Initial
	OSHA 29 CFR 1910.120 Refresher	1301.1(R)	7 - 8 hr	Annual
	OSHA 29 CFR 1910.120 Refresher (Monthly Modules) <sup>1</sup>	1303.1-12	0.5 - 1 hr each	Annual <sup>1</sup>
	First Aid	1203.1	2 - 2.5 hr	Triennial
	CPR	1203.2	3 - 4 hr	Annual
	Permit Training—Aragonite	1401.1	9 - 10 hr	Initial
	Permit Training Refresher—Aragonite	1401.1(R)	0.5 - 1 hr	Annual
	Permit Training—Clive	1401.4	9 - 10 hr	Initial
	Permit Training Refresher—Clive	1401.4(R)	0.5 - 1 hr	Annual
	General Employee Training			
	• Site Orientation—Aragonite	1101.1	1 - 1.5 hr	Initial
	• Site Orientation—Clive	1101.4	1 - 1.5 hr	Initial
	• Industrial Safety	1102.1	1 - 1.5 hr	Initial
	• Fire Prevention	1103.1	1 - 1.5 hr	Initial
	• Contingency Plan—Aragonite	1104.1	1 - 1.5 hr	Initial
	• Contingency Plan—Clive	1104.2	1 - 1.5 hr	Initial
	Annual Refresher			
	• Site Orientation Refresher (Clive Included)	1101.1(R)	~0.25 hr	Annual
	• Industrial Safety Refresher	1102.1(R)	~0.25 hr	Annual
	• Fire Prevention Refresher	1103.1(R)	~0.25 hr	Annual
	• Contingency Plan Refresher-Aragonite	1104.1(R)	~0.25 hr	Annual
	• Contingency Plan Refresher-Clive	1104.2(R)	~0.25 hr	Annual
	Compressed Gases	1202.2	~0.5 hr	Initial
	Venting Lines	1202.3	~0.5 hr	Initial
	Standard/Dual Wheel Forklift	1501.1	6 - 8 hr	Initial
	Standard/Dual Wheel Forklift Refresher	1501.1(R)	~1 hr	Annual
	Confined Space	1202.1	2 - 2.5 hr	Initial
	Confined Space Refresher <sup>2</sup>	1202.1(R)	~1 hr	Annual
<p>1 At a minimum, 8 of 12 modules are to be completed annually, if employee is taking the OSHA 29 CFR 1910.120 refresher monthly modules.</p> <p>2 Only for those employees who actually fill out a confined space permit. Otherwise, refresher is part of OSHA 1910.120 refresher.</p>				

**Table 2 – Required Training**

<b>JOB TITLE</b>	<b>COURSES</b>
<b>The following are administrative support jobs that do not have any contact with hazardous waste:</b>	
Document Control Coordinator, General Helper	1203.1, 1203.2, 1101.1, 1101.4, 1102.1, 1103.1, 1104.1, 1104.2 1101.1(R), 1102.1(R), 1103.1(R), 1104.1(R), 1104.2(R)
<b>The following are technical support jobs that have potential to work around hazardous waste:</b>	
General Manager, Sr. Environmental Manager, Health & Safety Manager, Operations Manager - Incineration, Operations Manager - Drum Production, Maintenance Manager, Technical Manager, Regulatory Compliance Specialist, Logistics Coordinator, Material Router, Business Manager, Operations Support Supervisor	1301.1, 1301.1(R) or 1303.1-12, 1203.1, 1203.2, 1401.1, 1401.1(R), 1401.4, 1401.4(R), 1101.1, 1101.4, 1102.1, 1103.1, 1104.1, 1101.1(R), 1102.1(R), 1103.1(R), 1104.1(R), 1104.2(R)
<b>The following are jobs that routinely work around hazardous waste:</b>	
Incineration Supervisor, Operations Supervisor – Maintenance, Operations Supervisor - I/E, Material Handler - Clive Operations, Lead Material Handler - Clive Operations	1301.1, 1301.1(R) or 1303.1-12, 1203.1, 1203.2, 1401.1, 1401.1(R), 1401.4, 1401.4(R), 1101.1, 1101.4, 1102.1, 1103.1, 1104.1, 1104.2, 1101.1(R), 1102.1(R), 1103.1(R), 1104.1(R), 1104.2(R), 1202.2, 1202.3, 1501.1, 1501.1(R), 1202.1, 1202.1(R)
Driver	1301.1, 1301.1(R) or 1303.1-12, 1203.1, 1203.2, 1401.1, 1401.1(R), 1401.4, 1401.4(R), 1101.1, 1101.4, 1102.1, 1103.1, 1104.1, 1104.2, 1101.1(R), 1102.1(R), 1103.1(R), 1104.1(R), 1104.2(R), 1501.1, 1501(R), 1202.1, 1202.1(R)